

# EXHIBIT 35



**U.S. Department of Justice**

Criminal Division

VAA:WHG:JEC:EEM:jmf

*Office of International Affairs*

*Washington, D.C. 20530*

April 2, 2018

VIA FEDERAL EXPRESS

Robert Leach  
Assistant United States Attorney  
U.S. Attorney's Office  
Northern District of California  
450 Golden Gate Avenue,  
Box 36055  
San Francisco, CA 94102

Re: Request for Assistance in the Investigation of Autonomy Corporation; OIA  
Reference Number: 182-53177 (please use when responding)

Dear Mr. Leach:


Pursuant to your request for assistance in the above-referenced matter, enclosed please find evidence from the United Kingdom, consisting of records from Vodafone. This letter supplements the ones dated October 28, 2016, November 23, 2016, January 12, 2017, April 6, 2017, June 22, 2017, August 29, 2017, October 17, 2017, and December 18, 2017, sending materials in this matter to you. This office is forwarding these materials as received and is not retaining a copy. Please review the material and advise within 30 days whether the evidence completes the execution of your request.

Article 7 of the Treaty Between the Government of the United States of America and the Government of the United Kingdom of Great Britain and Northern Ireland on Mutual Legal Assistance in Criminal Matters governs the use limitations applicable to this material. Should you anticipate the need to use the materials for a different purpose, please consult this office in advance for the purpose of obtaining authorization.

Please confirm by email to International Affairs Specialist Jason Fischer at [Jason.Fischer@usdoj.gov](mailto:Jason.Fischer@usdoj.gov) that you have received the enclosed evidence. If you have any questions, please do not hesitate to contact me at (202) 305-1643, or [Erin.Mikita@usdoj.gov](mailto:Erin.Mikita@usdoj.gov).

Sincerely,

Vaughn A. Ary  
Director

By:   
Erin E. Mikita  
Trial Attorney

Enclosure



International Criminality Unit  
2nd Floor Peel  
2 Marsham Street  
London  
SW1P 4DF

T +44 (0)20 7035 4040  
F +44 (0)20 7035 6986

[www.gov.uk/government/  
organisations/home-  
office](http://www.gov.uk/government/organisations/home-office)

Office of International Affairs  
U.S. Department of Justice  
1301 New York Avenue NW, Suite 935  
Washington, DC 20530

UKCA Ref: 11088700US

Your Ref: 182-53177

28 March 2018

Dear Jason Fischer

**LETTER OF REQUEST FOR LEGAL ASSISTANCE IN THE MATTER OF MICHAEL  
RICHARD LYNCH & OTHERS (AUTONOMY CORPORATION)**

I refer to the above letter of request dated 1 May 2016 referred to this Office under section 15 (2) of the Crime (International Co-operation) Act 2003 by the Secretary of State. I confirm that evidence has been obtained on behalf of the U.S. authorities.

I enclose the following electronic documents from Vodafone on an encrypted electronic disk to be transmitted to the U.S. authorities:

Letter of Request reference	Evidence to be transmitted
Page 14	Vodafone copy bills in the name of Sushovan Hussain covering 01/01/2011 – 31/05/2012 Witness Statement of SFO Investigator Ian Collins

Please note that the password to the encrypted disk will be given to you by email. If you have any queries regarding the above, please do not hesitate to contact me.

Yours faithfully,

Namra Khalid  
UK Central Authority  
*On behalf of the Secretary of State*  
D 020 7035 0967  
E [namra.khalid@homeoffice.gsi.gov.uk](mailto:namra.khalid@homeoffice.gsi.gov.uk)  
W [www.gov.uk/mutual-legal-assistance-mla-requests](http://www.gov.uk/mutual-legal-assistance-mla-requests)

Case ref:  
MLA/USA/968

**STATEMENT OF WITNESS**

*(Section 9 Criminal Justice Act 1967; CrimPR 16.2)*

**STATEMENT OF** Ian James Collins

**Age of witness (if over 18, enter "over 18"):** Over 18


**This statement** (consisting of 3 pages) **is true to the best of my knowledge and belief and I make it knowing that, if it is introduced in evidence, it would be an offence wilfully to have stated in it anything that I know to be false or do not believe to be true.**

**Signed:**  (witness)

**Date:** 26<sup>th</sup> March 2018

1. I am an Investigator employed by the Serious Fraud Office ("SFO") at 2-4 Cockspur Street, London SW1Y 5BS. I am also an accredited telecommunications Single Point of Contact (SPoC) as defined in the Regulation of Investigatory Powers Act 2000 (RIPA).
2. Pursuant to a MLAT request sent by the U.S. Department of Justice to the U.K. Central Authority and referred to the SFO, I made an application for communications data to Vodafone. This was authorised by Simon Daniel, Principal Investigator, as the Designated Person (DP). The following information was requested relevant to number [REDACTED] in the name of Ms Sushovan Hussain.
3. Copy billing covering 1<sup>st</sup> Jan 2011 to 31<sup>st</sup> May 2012. This time period was selected as I was informed by Vodafone that they hold copy billing for a maximum of 7 years and only in some instances.

**Signature**

  
.....

**Signature witnessed by:**

.....

Continuation of statement of Ian James Collins

4. Once the application was authorised, under Section 22(3) of RIPA I accessed Vodafone's online disclosure portal for law enforcement and submitted the request on 16<sup>th</sup> March 2018.
5. I downloaded the results on the 22<sup>nd</sup> March 2018. These were then saved onto the SFO case drive and copies sent to the case investigator and onto the material management team and loaded onto the SFO's document management system.
6. I produce as exhibits the following documents:

Exhibit	Description
IJC001	Vodafone copy bill for number [REDACTED] in the name of Ms Sushovan Hussain, dated 17/02/2011, covering January 2011.
IJC002	Vodafone copy bill for number [REDACTED] in the name of Ms Sushovan Hussain, dated 21/03/2011, covering February 2011.
IJC003	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 21/04/2011, covering March 2011.
IJC004	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 19/05/2011, covering April 2011.
IJC005	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 17/06/2011, covering May 2011.
IJC006	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 18/07/2011, covering June 2011.
IJC007	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 19/08/2011, covering July 2011.
IJC008	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 19/09/2011, covering August 2011.
IJC009	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 18/10/2011, covering September 2011.
IJC010	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 18/11/2011, covering October 2011.
IJC011	Vodafone copy bill for number [REDACTED] in the name

Signature



Signature witnessed by:

.....

## Continuation of statement of Ian James Collins

	of ref: Sushovan Hussain, dated 22/12/2011, covering November 2011.
<b>IJC012</b>	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 20/01/2012, covering December 2011.
<b>IJC013</b>	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 16/02/2012, covering January 2012.
<b>IJC014</b>	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 19/03/2012, covering February 2012.
<b>IJC015</b>	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 18/04/2012, covering March 2012.
<b>IJC016</b>	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 23/05/2012, covering April 2012.
<b>IJC017</b>	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 18/06/2012, covering May 2012.

Signature



Signature witnessed by:





International Criminality Unit

2nd Floor Peel  
2 Marsham Street  
London  
SW1P 4DF

T +44 (0)20 7035 4040

F +44 (0)20 7035 6986

[www.gov.uk/government/  
organisations/home-  
office](http://www.gov.uk/government/organisations/home-office)

Office of International Affairs

U.S. Department of Justice

1301 New York Avenue NW, Suite 935

Washington, DC 20530

UKCA Ref: I1088700US

Your Ref: 182-53177

28 March 2018

Dear Jason Fischer

**LETTER OF REQUEST FOR LEGAL ASSISTANCE IN THE MATTER OF MICHAEL  
RICHARD LYNCH & OTHERS (AUTONOMY CORPORATION)**

I refer to the above letter of request dated 1 May 2016 referred to this Office under section 15 (2) of the Crime (International Co-operation) Act 2003 by the Secretary of State. I confirm that evidence has been obtained on behalf of the U.S. authorities.

I enclose the following electronic documents from Vodafone on an encrypted electronic disk to be transmitted to the U.S. authorities:

Letter of Request reference	Evidence to be transmitted
Page 14	Vodafone copy bills in the name of Sushovan Hussain covering 01/01/2011 – 31/05/2012 Witness Statement of SFO Investigator Ian Collins

Please note that the password to the encrypted disk will be given to you by email. If you have any queries regarding the above, please do not hesitate to contact me.

Yours faithfully,

Namra Khalid

UK Central Authority

*On behalf of the Secretary of State*

D 020 7035 0967

E [namra.khalid@homeoffice.gsi.gov.uk](mailto:namra.khalid@homeoffice.gsi.gov.uk)

W [www.gov.uk/mutual-legal-assistance-mla-requests](http://www.gov.uk/mutual-legal-assistance-mla-requests)



**SFO**

Serious  
Fraud  
Office

2-4 Cockspur Street London SW1Y 5BS  
Director: David Green CB QC

Robert Leach  
Trial Attorney  
U.S. Department of Justice  
Criminal Division, Fraud Section

Your Ref: DOJ No. 182-53177

Our Ref: MLA/USA/96816

Date: 27<sup>th</sup> March 2018

Dear Robert

**RE: MICHAEL LYNCH, SUSHOVAN HUSSAIN, STEPHEN CHAMBERLAIN,  
ANDREW KANTER AND ANGELA BACARES**

I refer to the letter of request dated 29<sup>th</sup> January 2015 referred to this Office under section 15(2) of the Crime (International Co-operation) Act 2003 by the Secretary of State for the Home Office.

We enclose evidence obtained from Vodafone. This includes one electronic disk and signed witness statement.

The password for the encrypted electronic material will be sent to you by email.

Letter of Request reference	Evidence to be transmitted
Page 14	Vodafone copy bills in the name of Sushovan Hussain covering 01/01/2011 – 31/05/2012 Witness Statement of SFO Investigator Ian Collins

Should you have any further questions regarding this material please do not hesitate to contact me.

Yours sincerely

**Ian Collins**  
Investigator  
International Assistance  
Direct Tel: +44 (0)20 7239 7149  
Email: [ian.collins@sfo.gsi.gov.uk](mailto:ian.collins@sfo.gsi.gov.uk)



Case ref:  
MLA/USA/968

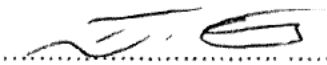
**STATEMENT OF WITNESS**

*(Section 9 Criminal Justice Act 1967; CrimPR 16.2)*

**STATEMENT OF** Ian James Collins

**Age of witness (if over 18, enter "over 18"):** Over 18


**This statement (consisting of 3 pages) is true to the best of my knowledge and belief and I make it knowing that, if it is introduced in evidence, it would be an offence wilfully to have stated in it anything that I know to be false or do not believe to be true.**

**Signed:**  (witness)

**Date:** 26<sup>th</sup> March 2018

1. I am an Investigator employed by the Serious Fraud Office ("SFO") at 2-4 Cockspur Street, London SW1Y 5BS. I am also an accredited telecommunications Single Point of Contact (SPoC) as defined in the Regulation of Investigatory Powers Act 2000 (RIPA).
2. Pursuant to a MLAT request sent by the U.S. Department of Justice to the U.K. Central Authority and referred to the SFO, I made an application for communications data to Vodafone. This was authorised by Simon Daniel, Principal Investigator, as the Designated Person (DP). The following information was requested relevant to number [REDACTED] in the name of Ms Sushovan Hussain.
3. Copy billing covering 1<sup>st</sup> Jan 2011 to 31<sup>st</sup> May 2012. This time period was selected as I was informed by Vodafone that they hold copy billing for a maximum of 7 years and only in some instances.

**Signature**

  
.....

**Signature witnessed by:**

.....


Continuation of statement of Ian James Collins

4. Once the application was authorised, under Section 22(3) of RIPA I accessed Vodafone's online disclosure portal for law enforcement and submitted the request on 16<sup>th</sup> March 2018.
5. I downloaded the results on the 22<sup>nd</sup> March 2018. These were then saved onto the SFO case drive and copies sent to the case investigator and onto the material management team and loaded onto the SFO's document management system.
6. I produce as exhibits the following documents:

Exhibit	Description
IJC001	Vodafone copy bill for number [REDACTED] in the name of Ms Sushovan Hussain, dated 17/02/2011, covering January 2011.
IJC002	Vodafone copy bill for number [REDACTED] in the name of Ms Sushovan Hussain, dated 21/03/2011, covering February 2011.
IJC003	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 21/04/2011, covering March 2011.
IJC004	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 19/05/2011, covering April 2011.
IJC005	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 17/06/2011, covering May 2011.
IJC006	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 18/07/2011, covering June 2011.
IJC007	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 19/08/2011, covering July 2011.
IJC008	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 19/09/2011, covering August 2011.
IJC009	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 18/10/2011, covering September 2011.
IJC010	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 18/11/2011, covering October 2011.
IJC011	Vodafone copy bill for number [REDACTED] in the name

Signature

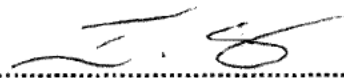
Signature witnessed by:




## Continuation of statement of Ian James Collins

	of ref: Sushovan Hussain, dated 22/12/2011, covering November 2011.
IJC012	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 20/01/2012, covering December 2011.
IJC013	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 16/02/2012, covering January 2012.
IJC014	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 19/03/2012, covering February 2012.
IJC015	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 18/04/2012, covering March 2012.
IJC016	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 23/05/2012, covering April 2012.
IJC017	Vodafone copy bill for number [REDACTED] in the name of ref: Sushovan Hussain, dated 18/06/2012, covering May 2012.

Signature



Signature witnessed by:

